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STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY

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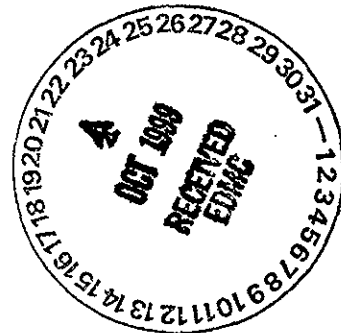
October 19, 1999

Mr. Jackson Kinzer  
U.S. Department of Energy  
P.O. Box 550, MSIN: S7-50  
Richland, Washington 99352

Ms. Mary Delozier  
Lockheed Martin Hanford Corporation  
P.O. Box 1500, MSIN: H7-07  
Richland, Washington 99352

Mr. Anthony Umek  
Fluor Daniel Hanford, Inc.  
P.O. Box 1000, MSIN: S7-40  
Richland, Washington 99352

Mr. Edward Aromi  
Waste Management Federal Services  
of Hanford, Inc.  
P.O. Box 700, MSIN: H6-10  
Richland, Washington 99352



Dear Messrs. Kinzer, Umek, Aromi, and Ms. Delozier:

Thank you for the assistance of the U.S. Department of Energy (USDOE), Fluor Daniel Hanford, Inc. (FDH), Waste Management Federal Services of Hanford, Inc. (WMH), and Lockheed Martin Hanford Corporation (LMHC) personnel during the Washington State Department of Ecology's (Ecology) recent inspection of the ninety (90) day accumulation areas on the Hanford Site.

Findings from this inspection include the following violation of Washington Administrative Code (WAC) Chapter 173-303 Dangerous Waste Regulations and three (3) concerns related to ninety (90) day accumulation of dangerous and/or mixed waste on-site.

VIOLATIONS:

- #1) **Part II, General Facility Conditions, Condition II.I.1.a, within the Dangerous Waste Portion of the Resource Conservation and Recovery Act Permit for the Treatment, Storage, and Disposal of Dangerous Waste at the Hanford Facility.**

USDOE and FDH failed to maintain a current list identifying all active ninety (90) day waste storage areas and their locations per condition II.I.1.a of the Dangerous Waste Portion of the Resource Conservation and Recovery Act Permit for the Treatment, Storage, and Disposal of Dangerous Waste at the Hanford Facility.

*Ecology discovered ninety (90) day accumulation areas located within the east tank farms on the Hanford Site not described in waste accumulation area listings provided to Ecology by the USDOE and its contractors.*

CONCERNS:

- #1) When inquiring about emergency response activities related to the 209E ninety (90) day area, Ecology received confusing responses and was initially provided with two (2) contingency plans for the ninety (90) day area (HNF-IP-0263-TF and HNF-IP-0263-209E). A third out-of-date contingency plan was located at the 209E ninety (90) day area (WHC-IP-0263-TF).

*Personnel responsible for managing waste in ninety (90) day areas must be trained to current contingency planning including knowledge of the emergency procedures within the current contingency plan and knowledge of the plan's location. Contingency plans for ninety (90) day accumulation areas must be maintained at a location within the TSD in which the ninety (90) day area is located, or if the ninety (90) day area is not within a TSD, at a location readily accessible from the ninety (90) day accumulation area. Ecology is continuing review of contingency planning requirements within the Hanford Site and will further discuss this issue with the USDOE and its contractors at a future date.*

- #2) Lead acid batteries accumulated for recycle at the 209 E area were not adequately labeled.

*Waste for recycle must be appropriately labeled per the Hanford centralized recycling program.*

- #3) At the time of Ecology's 09/16/99 inspection, the log sheet for the 209E ninety (90) day area incorrectly listed two (2) drums stored in the area with accumulation dates of 06/14/99, indicating these containers had exceeded their ninety (90) day accumulation period by five (5) days.

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*Inspection of the 209E ninety (90) day area and review of the solid waste information tracking system (SWITS) revealed the drums were not present and had been shipped prior to exceeding the ninety (90) day accumulation period. As a best management practice, all waste tracking documentation should be kept current.*

In order to correct the violations identified in this Notice of Correction, please complete the following corrective measures within the time frames specified. Failure to correct the violations described in this letter may result in the issuance of an Administrative Order and/or penalties per Revised Code of Washington (RCW) 70.105.080. A request for additional time to complete the corrective measures identified in this Notice of Correction must be in writing, describe the reasons for the request for additional time, and received by me for consideration no later than October 22, 1999.

**CORRECTIVE MEASURES:**

**#1) Part II, General Facility Conditions, Condition II.I.1.a, within the Dangerous Waste Portion of the Resource Conservation and Recovery Act Permit for the Treatment, Storage, and Disposal of Dangerous Waste at the Hanford Facility.**

Within seven (7) days of receipt of this letter, USDOE must submit a written report to Ecology describing the means by which a current listing of all ninety (90) day accumulation areas on the Hanford Site will be maintained. This report must describe how listings of ninety (90) day accumulation areas will include the date of the listing, specific location of the ninety (90) day areas by generator, and distinguish ninety (90) day accumulation areas from other waste accumulation areas that may be included in such a listing (i.e., distinguish from satellite accumulation areas and waste recycling areas). This report must include a current listing of all ninety (90) day areas within the Hanford Site.

Please complete and return the enclosed Certificate of Compliance to me by October 26, 1999. If you have any questions regarding this letter, please contact me at (509) 736-3031.

Sincerely,



Bob Wilson, Compliance Inspector  
Nuclear Waste Program

Enclosure

cc: James Rasmussen, USDOE  
Steve Szendre, FDH  
Brad Erlandson, LMHC

Jim Bradley, WMH  
Mary Lou Blazek, OOE  
Administrative Record: TWRS

## CERTIFICATE OF COMPLIANCE

As a legal representative of the U.S. Department of Energy, I certify, to the best of my knowledge, the completion of items requested by the Washington State Department of Ecology on October 19, 1999, with regard to the inspection of ninety (90) day accumulation areas, located on the Hanford Site, Facility ID number WA 7890008967, as shown below.

### COMPLIANCE STATUS

Corrective Measure	Date Due	Date Complete	Initials	Comments
#1	10/26/99			

\_\_\_\_\_  
Signature, USDOE-RL Representative

\_\_\_\_\_  
Date